

## **CHAPTER 6.0**

### **OTHER CEQA/NEPA CONSIDERATIONS**

This chapter addresses other topics required by CEQA and NEPA in an EIR/EIS:

- Irreversible and irretrievable commitments of resources and significant irreversible environmental changes
- Growth-inducing impacts
- Relationship between local short-term uses of the environment and long-term productivity
- Effects found not to be significant
- CEQA Appendix F Energy Evaluation

The analysis of the items above is not appreciably different from one alternative to another, but largely relates to whether the project is constructed. Therefore, this discussion does not differentiate between project alternatives.

#### **6.1 SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT OR IRRETRIEVABLE COMMITMENTS OF RESOURCES**

State CEQA Guidelines (14 CCR 15126.2[c]) and NEPA (40 CFR 1502.16) require analysis of significant irreversible and irretrievable effects. CEQA requires evaluation of irretrievable resources to ensure that their use is justified. NEPA requires an explanation of which environmental impacts are irreversible or would result in an irretrievable commitment of resources.

Resources that are irreversibly or irretrievably committed to a project are those typically used on a long-term or permanent basis; however, some are considered short-term resources that cannot be recovered and are thus considered irretrievable. These resources may include the use of nonrenewable resources such as fuel, wood, or other natural or cultural resources. Human labor is also considered a nonretrievable resource because labor used for the proposed action would not be used for other purposes. The unavoidable destruction of natural resources that limit the range of potential uses of that particular environment would also be considered an irreversible or irretrievable commitment of resources.

The proposed project would involve two types of resources: (1) general industrial resources, including capital, labor, fuels, and construction materials; and (2) project-specific resources, such as biological resources, water and soil/sediment resources, land uses, and landforms and visual qualities at the affected sites. The following industrial resources would not be retrievable:

- Nonrenewable resources such as gasoline and diesel oil would be used to power construction equipment and vehicles.
- Nonrenewable energy resources and labor would be necessary to operate barges, trucks, pumps, and equipment used during construction and maintenance activities.
- Electrical power would be used for lighting and potentially dredge operations.
- Energy resources would be required to power the pumps at the intakes and to transport dredged materials to placement sites.

Generally, irreversible environmental changes to the natural environment would occur within the lagoon study area to be excavated and dredged. Many soil and aquatic bottom-dwelling organisms (e.g., plants and invertebrates) living in the lagoon would be destroyed by the construction activities. Although substantial evidence (see Section 3.6 [Biological Resources]) indicates that recolonization and recovery of biological communities would occur in these areas, the length of time can be variable (e.g., 1 to 2 years), and the species occurring would be determined by the type of habitat created. However, the overall project would create a net gain in more biologically productive wetland habitats than presently exist in the project area and would not result in a significant irreversible change to the environment. In addition, construction of a tidal inlet and associated CBFs under Alternative 2A is not an irreversible change. If the wetland were diked to reduce the tidal prism, the inlet would let sand in and CBFs could be removed. The materials placement activities in the cities of Encinitas, Solana Beach, and San Diego would result in the placement of between 160,000 and 1.4 mcy of dredged beach-compatible fill material. This project component would increase protection of existing beaches, which not only provide recreational opportunities for residents but also contribute to the regional tourist industry.

## **6.2 GROWTH INDUCEMENT**

Section 15126(g) of the CEQA Guidelines and the CEQ NEPA Regulations (42 CFR 1508.8) require a discussion of potential growth-inducing impacts of the proposed action and alternatives. Growth may be considered beneficial, adverse, or of no significance environmentally, depending on its actual impacts to the environmental resources present. A project may be growth inducing if it does any of the following:

- Results in development of direct population-generating uses
- Provides accommodations for growth or removes obstacles to growth
- Requires expansion of public services or utilities
- Directly or indirectly fosters economic growth
- Sets a precedent or facilitates other activities that could significantly affect the environment

Restoration of the San Elijo Lagoon and associated materials placement activities would not be considered growth inducing. The proposed project does not include the development of new housing or population-generating uses that would directly or indirectly induce population growth, remove obstacles for future growth, or generate increased demand for public services and utilities in the project area. The proposed project would temporarily require construction workers, but most would be expected to come from the local workforce. While the proposed project would enhance the existing ecological functions of the lagoon and would continue to provide passive recreation opportunities, it is not anticipated that the project would attract sufficient numbers of new visitors to induce the expansion of existing tourist-related commercial uses. The materials placement component of the proposed project would result in a temporary increase in beach area and sand cover at each of the on beach placement sites and would provide for an offshore stockpile of materials for future opportunistic uses. A benefit of this activity would be enhancement or continuation of the recreational usage of each of the onshore placement sites. It must be emphasized, however, that such localized recreational benefits would be temporary (the maximum lifespan of onshore materials placement is approximately 5 years), although the dispersed sand may continue to cycle in the littoral system past that time. The resulting temporary recreational benefits derived from the additional beach area would not be expected to increase the demand for public services and utilities, nor create a need for additional recreational facilities above current projections.

### **6.3 SHORT-TERM USES AND LONG-TERM PRODUCTIVITY**

The CEQ NEPA Regulations (40 CFR Part 1500 et seq.) require that an EIS discuss issues related to environmental sustainability. In general, this discussion is not considered an environmental effect for which either significance is defined, or mitigation is recommended. However, the discussion, as it relates to environmental consequences, must be included in the EIS. This requires consideration of “the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity” (42 USC 4332[C][iv]).

Short-term use of the environment includes dredging and excavation activities as well as placement of dredged materials in offshore, nearshore, and onshore environments as identified in

Chapter 2 and analyzed throughout this document. Short-term construction-related impacts, defined for this project as impacts that occur during construction to project completion, are anticipated from these activities:

- Temporary restrictions to public access in portions of the lagoon and the inlet/beach area to maintain public safety
- Temporary increase in turbidity within the lagoon from construction activities, which could negatively impact water quality for a very short duration (less than 1 day)
- Temporary increases in turbidity and siltation from materials placement at the offshore stockpile sites and/or nearshore Cardiff, which could affect diving conditions
- Temporary restrictions to public beach areas at onshore materials placement sites to maintain public safety
- Temporary visual impacts associated with the presence of construction equipment within the lagoon and at materials placement sites, vegetation removal within the lagoon, and construction of CBFs
- Alteration of existing habitats and displacement or inadvertent extirpation of some organisms, particularly bottom- and soil-dwelling invertebrates and plants
- Temporary traffic-related impacts due to Coast Highway 101 bridge construction or improvements
- Temporary construction emissions in the immediate vicinity of the project site during the approximately 3-year construction period
- Potential for overhead electric poles within the lagoon to be relocated causing minimal or no disruption to service

However, as a whole, the project would create a long-term net benefit overall, defined as 50 years after project completion. Benefits are as follows:

- Helping to restore aquatic functions by opening the tidal channel and maintaining tidal exchange between the ocean and lagoon/wetlands, thereby improving water quality and health of wetland habitat
- Restoring habitat and improving existing habitat values, thereby benefiting threatened and endangered species (clapper rail and Belding's savannah sparrow)
- Increasing acreage of tidal habitats with beneficial impacts on associated species

- Improving functions and values of existing tidal habitats with beneficial impacts on associated vegetation communities
- Creating nesting areas that would benefit least tern and snowy plover and other waterbirds that may use these sites and would contribute to the restoration of ecosystem functions and values
- Improving lagoon hydrology, which would generally reduce current flood-related hazards to existing infrastructure and adjacent development
- Enhancing tidal circulation, which would facilitate the control of vectors at the lagoon and reduce the public health risk associated with vector-borne diseases
- Preserving the site as an open space reserve and passive recreational area
- Providing beach and littoral cell nourishment along San Diego's north county coastline

#### 6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires that the EIR “contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.” An Initial Study was not prepared for the proposed project; therefore, a brief description of the issue area where effects were found not to be significant is included Table 6-1.

**Table 6-1**  
**Effects Found Not to Be Significant**

<b>Environmental Issue Area</b>	<b>Effects Found Not to Be Significant Rationale</b>
Agricultural Resources	This project would not convert farmland to nonagricultural use, nor would this project conflict with the existing agricultural zoning, as there is no farmland in the project area. No changes to the existing environment that could result in conversion of farmland to nonagricultural use would occur.
Mineral Resources	No mineral resource that would be valuable to the region and the residents of California would be lost as a result of this project. This project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Preliminary testing of subsurface deposits indicates that no known mineral resources would be affected by the proposed project.
Population and Housing	The proposed project does not include the development of population-generating uses and would also not displace any existing housing, nor would the project displace any people.

The remaining issue areas included in Appendix G of the CEQA Guidelines were evaluated in detail in Sections 3.1 through 3.16 of this document.

## **6.5 CEQA APPENDIX F ENERGY EVALUATION**

Public Resources Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to describe, to the extent relevant and applicable, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Also, CEQA Guidelines, Appendix F, Energy Conservation, states that EIRs are required to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

The SELRP would result in the consumptive use of energy required to operate dredges, trucks, pumping equipment, grading equipment, and equipment associated with Coast Highway 101 bridge work. Energy sources such as gasoline and diesel oil would be used to power construction and maintenance equipment and vehicles such as barges, trucks, and pumps. Electrical power would be used for lighting and, potentially, dredge operations.

All alternatives would require the use of energy for project implementation in a generally similar nature, but would vary in degree. Alternative 2A would require the highest level of energy consumption because it would involve the largest volume of dredged material and material placement, and construction of a new Coast Highway 101 bridge. Alternative 1B would require similar energy consumption as Alternative 2A, but at a slightly lower amount due to less dredging and material placement, and only retrofit work on the existing Coast Highway 101 bridge. Alternative 1A would require the least amount of energy use for implementation because it would involve the lowest volume of dredged material and placement, and only retrofit work on the existing bridge. The No Action Alternative would not require energy consumption for construction, as none would occur.

Elements of the project design lend themselves to energy savings, such as the reuse of dredged materials in the littoral zone or local beaches where the material can be pumped directly or be delivered by a short barge trip that minimizes the energy expenditure that would otherwise be required to haul the dredged material to a landfill or other disposal site. Once completed, the SELRP would not generate additional daily vehicle trips, necessitate an increased need for ongoing energy use, or require other energy-consuming activities, with the exception of periodic maintenance.

With the exception of the construction or retrofit work on the Coast Highway 101 bridge, restoration of the lagoon and placement/disposal of the material would not include construction

of structures or other development that would require substantial deliveries or truck trips to transport building materials to the site, or create additional sources of long-term energy consumption. Because of the existing seismic deficiencies of the Coast Highway 101 bridge, it is likely that the work proposed to replace or retrofit the bridge would be undertaken through another project in the near future, if not through the SELRP, and similar energy expenditures would be required.

Although the project would require the use of a variety of energy resources, the energy used for implementation of the SELRP is not considered wasteful, inefficient, and/or unnecessary. The necessary energy consumption would result in the positive benefits of improved lagoon hydrology and ecology, as well as a structurally sound Coast Highway 101 bridge.

Because no energy-related impacts were identified, there are no mitigation or minimization measures proposed. However, certain PDFs for the project would promote energy efficiency and would decrease overall energy consumption. For example, PDF-10 requires all equipment engines to be in good working condition and to minimize idling time, and PDF-34 requires that two-way circulation be maintained at all times on public roads, which would avoid the need for lengthy delays or detours.

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